



IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

KWASHIE SENAM ZILEVU

*Defendant.*

Criminal No. 1:19-CR-356

Counts 1–3: 18 U.S.C. § 1029(a)(5)  
Access Device Fraud

Counts 4–6: 18 U.S.C. § 1028A(a)(1)  
Aggravated Identity Theft

Forfeiture Notice

**INDICTMENT**

November 2019 Term – at Alexandria, Virginia

**COUNTS ONE THROUGH THREE  
(Access Device Fraud)**

THE GRAND JURY CHARGES THAT:

**Introductory Allegations**

At all times relevant to this Indictment:

1. The Defendant, KWASHIE SENAM ZILEVU (“ZILEVU”), resided in Woodbridge, Virginia, within the Eastern District of Virginia.
2. ZILEVU was employed as an information technology specialist and supervisory information technology specialist with the United States Internal Revenue Service (“IRS”).
3. ZILEVU owned several businesses, including MacroTele, LLC, a business organized under the laws of the Commonwealth of Virginia, which ZILEVU claimed sold telephone calling cards he created.

**The Scheme to Defraud**

4. In furtherance of his scheme to defraud, ZILEVU obtained access devices, as defined in Title 18 U.S.C § 1029(e)(1), (hereinafter “Credit Cards”), by unlawfully using the real and actual names or other means of identification of real persons, referred to herein as Individual A, Individual B, and Individual C (collectively “Individuals”). ZILEVU did so by knowingly causing the fraudulently obtained Credit Cards in the names of the Individuals to be mailed to his home or the home of his parents, both of which are located in Woodbridge, Virginia, which is within the Eastern District of Virginia.

5. Once ZILEVU fraudulently obtained the Credit Cards in the Individuals’ names, he used them to make several thousand dollars’ worth of purchases at retail stores and other companies located in the Eastern District of Virginia and elsewhere. These transactions included purchases at a jewelry store, home improvement stores, restaurants and electronic stores, among others. These unlawful Credit Card transactions affected interstate commerce. ZILEVU conducted these unlawful transactions for his own benefit without having lawful authority to do so.

6. In addition, ZILEVU also used the unlawfully obtained Credit Cards to purchase international and domestic flights for himself to travel to places such as Reykjavik, Iceland; Montego Bay, Jamaica; and Miami, Florida. He further used the unlawfully obtained Credit Cards to pay for other individuals to accompany him on trips, including for a family member to travel internationally.

7. ZILEVU further used the fraudulently obtained Credit Cards to make unlawful payments to himself through the company he owned, MacroTele, LLC.

**Fraudulent Transactions With Access Devices**

8. On or about the dates indicated in the table below, in the Eastern District of Virginia and elsewhere, ZILEVU knowingly and with intent to defraud, effected transactions with access devices, as defined in Title 18, United States Code, § 1029(e)(1), namely, credit cards, issued to other persons, identified herein as Individual A, Individual B and Individual C, to receive goods, services, and other things of value, specifically, home construction and improvement materials and airline tickets, from on or about January 2016 to on or about December 2017, of a value exceeding \$1,000, said conduct affecting interstate commerce, in violation of 18 U.S.C. § 1029(a)(5).

<b>Counts</b>	<b>Approximate Dates</b>	<b>Individuals</b>	<b>Transaction Descriptions</b>
1	April 30, 2016 to February 24, 2017	<b>Individual A</b>	ZILEVU charged approximately \$49,000 to an American Express credit card in Individual A's Name to receive goods or services at Lowe's Home Improvement, Floor & Décor, BJ's Wholesale Club and other stores.

<b>Counts</b>	<b>Approximate Dates</b>	<b>Individuals</b>	<b>Transaction Descriptions</b>
2	August 21, 2017 to September 15, 2017	<b>Individual B</b>	ZILEVU charged approximately \$10,273.39 to a U.S. Bank & Trust credit card in Individual B's name to receive goods or services such as airline tickets for himself to travel to from Dulles, Virginia to Montego Bay, Jamaica.
3	December 26, 2017 to March 6, 2018	<b>Individual C</b>	ZILEVU charged approximately \$9,641.69 to a U.S. Bank & Trust credit card in Individual C's name to receive goods or services such as airline tickets to travel from Dulles, Virginia to Reykjavik, Iceland and to make purchases at Omar Gold, a jewelry store in Woodbridge, Virginia.

(In violation of Title 18, U.S. Code, § 1029(a)(5).)

**COUNTS FOUR THROUGH SIX  
(Aggravated Identity Theft)**

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations set forth in paragraphs 1 through 8 of Counts One through Three of this Indictment are realleged and incorporated as if set forth herein.

2. On or about the dates listed in the table below, in the Eastern District of Virginia, ZILEVU did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, 18 U.S.C. § 1029(a)(5), knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, § 1028A.

<b>Counts</b>	<b>Approximate Dates</b>	<b>Means of Identification (Specific Usage)</b>	<b>Felony Offense</b>
4	January 25, 2016	<b>Individual A's Name</b> (Used to Obtain an American Express Credit Card in Individual A's Name)	Fraud and related activity in connection with access devices (18 U.S.C. § 1029(a)(5))
5	August 21, 2017	<b>Individual B's Name</b> (Used to Obtain a U.S. Bank & Trust Credit Card in Individual B's Name)	Fraud and related activity in connection with access devices (18 U.S.C. § 1029(a)(5))

<b>Counts</b>	<b>Approximate Dates</b>	<b>Means of Identification (Specific Usage)</b>	<b>Felony Offense</b>
6	December 19, 2017	<b>Individual C's Name</b> (Used to Obtain a U.S. Bank & Trust Credit Card in Individual C's Name)	Fraud and related activity in connection with access devices (18 U.S.C. § 1029(a)(5))

(In violation of Title 18, U.S. Code, § 1028A.)

### **FORFEITURE NOTICE**

#### **THE GRAND JURY FURTHER CHARGES THAT:**

1. There is probable cause that the property described in this Forfeiture Notice is subject to forfeiture pursuant to the statutes described herein.
2. Pursuant to Federal Rule of Criminal Procedure 32.2, Defendant Zilevu, is hereby notified that the United States will seek forfeiture as part of any sentence in accordance with Title 18, U.S. Code, §§ 982(a)(2)(B) and 1029(c)(1)(C), in the event of Defendant's convictions under Counts One through Three of this Indictment.
3. Upon conviction of the violations of Title 18, U.S. Code 18 U.S.C. § 1029(a)(5), as alleged in Counts One through Three, the defendant shall forfeit to the United States any property constituting, and derived from, proceeds the person obtained directly and indirectly, as a result of the commission of the offense(s) of conviction, and any personal property used or intended to be used to commit such offense, including, but not limited to:
  - a. Silver iPhone with T-Mobile SIM card (no visible S/N)
  - b. Black iPhone Model A1778, BCC ID: BCGE3091A, IC 579CHE3091A
  - c. Amazon Fire Stick charger & remote, FCCID 2AE6S-0948
  - d. T-Mobile Sim card
  - e. Mint SIM card
  - f. Three thumb drive (No visible S/N)
  - g. PayPal card reader, S/N 17306RP10251501
  - h. MacBook Pro, S/N: C02V1222HV2L
  - i. iPad S/N: DMPKGDG3F183

- j. Apple computer Model A1218, S/N: YM71333XWH7
- k. HP laptop 5CD5300CIT
- l. HP Pavilion dv6500 S/N CNF7453ZMW
- m. HP Compaq 8530w S/N: MXL9400FBY
- n. Dell laptop IC: 4324A-BRCM1028
- o. Dell Laptop IC: 4324A-BRCM1022
- p. Black HTC phone (No visible S/N)
- q. NOVELL thumb drive (No visible S/N)
- r. Mint mobile SIM card
- s. SANDISK Bluetooth wireless adapter
- t. Hard Drives: Western Digital S/N: WCAMD4818444, Maxtor S/N: Y2JD81GE, Seagate S/N: Z3TX7CG7. Samsung S/N: S14JJNBQ182078. Seagate S/N: Z3TXAXHD. Backup+ Seagate S/N: NA5K6N86. Coby Kyros S/N: 804120037494. Western Digital S/N: WCAU46168439. Kingston HyperX 120GB S/N: 50026B732C016C06 501ABBF0. Amazon Eco FCCID: 2AHSE-2045. Sysco Linksys Router S/N: CSE21J2063A5.
- u. White Motorola phone (No S/N)
- v. ALCATEL OneTouch Pixi (No S/N)
- w. White Samsung phone
- x. Hard drive Seagate S/N: 5VELXRNS
- y. Empty Black hard drive case
- z. Hard drive: Toshiba S/N 53UBP338T XN1 HDKEB78E0A01 T



- aa. Hard Drive: Hitachi Travelstar S/N: KCH2PR0K
- bb. Hard Drive: Western Digital S/N: WXEX07I09347
- cc. Hard Drive: Seagate S/N: 5TG177KJ
- dd. Hard Drive: Seagate S/N: 5VJ09K59
- ee. Samsung Micro SD adapter
- ff. Micro SD adapter (No visible S/N)
- gg. One broken thumb drive
- hh. Various chargers
- ii. Grey phone AXON ZTE FCC ID: SRQ-ZTEA2017U
- jj. White iPad S/N: DMQKQST7F185
- kk. Grey iPad S/N DMPGDA7NDFHY, (marked as "Property of Virginia Tech")
- ll. Grey iPad S/N: F4KNF05VGSV7
- mm. Grey iPad S/N: V5023080Z38, (marked as "Property of Virginia Tech")
- nn. Grey iPad S/N: DLXFPNMDDFHY, (marked as "Property of Virginia Tech" broken glass)
- oo. MacBook Pro S/N: C17LG55BF5V7
- pp. Grey MacBook S/N: C02F49FDDH2G
- qq. Black Gygaware S/N: 10A09
- rr. Grey Notebook laptop S/N: NC560P2F02303
- ss. Black Harmony router S/N: 1639WD023608
- tt. Hard Drive Hitachi Travelstar P/N: 08K0863

- uu. DVD player Plextor S/N: 6981114001483734208257
- vv. MyPassport external Hard drive S/N: WXC1AA7H3YK7
- ww. Original Xbox S/N: 606078142005
- xx. Amazon Echo Dot FCC ID: 2AHSE-2045
- yy. Black Apple Watch (no visible S/N)
- zz. Black Amazon Firestick FCC ID: 2AE6S0948
- aaa. Various chargers
- bbb. Two ScanDisk SD cards
- ccc. Grey computer server, Serial#: 5D5DXP1
- ddd. Black computer server, Serial#: Y950RA01
- eee. Black thumb drive
- fff. Black computer server, DELL, LBL P/N: D884WA01
- ggg. Grey computer server, serial#: 185YFN1
- hhh. Grey computer server, serial#: 8J2N8R1
- iii. Grey computer server, serial#: 5NDWJM1RAC
- jjj. Grey computer server, serial#: 5NDWJM1RAC
- kkk. Grey computer server, serial#: 6N97QM1
- lll. Grey computer server, serial#: MX261100BE
- mmm. Black computer server, serial#: CS0003501
- nnn. IRS HP Laptop Serial#: MXL41524DR
- ooo. IRS Spyrus thumb drive Serial#: 0000B2008095: IRS Barcode  
A005077678
- ppp. Black Lenovo Laptop with charger. Serial# UB02339435

- qqq. Seagate 500 Gbytes. Serial# 9QM34H3G
- rrr. Imaged worksheet from DFS (Two iPhones white/Gold)
- sss. Wells Fargo Instant Issue Debit Card. "Wells Fargo Customer" # 4737030039390892
- ttt. Two GSA Smart Pay 2 master cards for KWASHIE ZILEVU with Citi Bank letter
- uuu. One Wells Fargo instant issue debit card, Name "Wells Fargo Customer" card# 4737030977475788
- vvv. Black electronic Fireplace. (No visible S/N)

4. Notice is further given that, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 18 U.S.C. § 1029(2), it is the intent of the United States to seek forfeiture of any other property of the Defendants if any of the property described above as being subject to forfeiture (or any portion thereof), as a result of any act or omission of any defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(All in accordance with Title 18, U.S. Code, §§ 982(a)(2)(B), and 1029(c)(1)(C); Title 21, U.S. Code, § 853(p); and Fed. R. Crim. P. 32.2(a).)

Dated this 26<sup>th</sup> day of November, 2019.

A TRUE BILL:

**Pursuant to the E-Government Act,  
The original of this page has been filed  
under seal in the Clerk's Office**

\_\_\_\_\_  
Foreperson of the Grand Jury

G. ZACHARY TERWILLIGER  
UNITED STATES ATTORNEY

By:



Ronald Fiorillo  
Assistant United States Attorney  
Jordy Hur  
Special Assistant United States Attorney

Pursuant to the E-Government Act,  
The original of this page has been filed  
under seal in the Clerk's Office